# IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS WACO DIVISION

ECREDIT SOLUTIONS LLC,	<b>§</b>
Plaintiff,	§
<b>v.</b>	§
	<b>§</b>
VYZE, INC.,	§ JURY TRIAL DEMANDED
	§
Defendant.	§
	§
	§

#### PLAINTIFF'S ANSWER TO DEFENDANT VYZE, INC.'S COUNTERCLAIMS

Plaintiff eCredit Solutions LLC ("Plaintiff") submits this answer to Defendant Vyze, Inc.'s Counterclaims per Fed. R. Civ. P. 12.

#### **ANSWER**

- 1. Admitted.
- 2. Admitted.
- 3. To the extent Paragraph 3 contains any allegations, Plaintiff denies them.
- 4. Plaintiff admits that counterclaims arise under the patent laws of the United States, and admits the Court has proper jurisdiction. Plaintiff denies all other allegations of Paragraph 4.
- 5. Admitted.
- 6. Admitted except as to the statement "though not necessarily convenient." Plaintiff denies the allegation that this Court is an inconvenient forum.

## COUNT I – DECLARATION REGARDING (ALLEGED) NON-INFRINGEMENT

7. To the extent Paragraph 7 contains any allegations, Plaintiff denies them.

8. Plaintiff admits that there is an actual controversy based on Plaintiff's filing of this action.

Plaintiff denies the remaining allegations of Paragraph 8.

- 9. Denied.
- 10. Denied.

## **COUNT II – DECLARATION REGARDING (ALLEGED) INVALIDITY**

- 11. To the extent Paragraph 11 contains any allegations, Plaintiff denies them.
- 12. Plaintiff admits that there is an actual controversy based on Plaintiff's filing of this action.

Plaintiff denies the remaining allegations of Paragraph 12.

- 13. Denied.
- 14. Denied.

## **RESPONSE TO PRAYER FOR RELIEF**

Plaintiff denies that Defendant is entitled to any of the relief sought in its prayer.

Respectfully Submitted,

/s/ Papool S. Chaudhari

Dated: June 4, 2020 By:

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ATTORNEYS FOR PLAINTIFF ECREDIT SOLUTIONS, LLC

**CERTIFICATE OF SERVICE** 

The undersigned certifies that the foregoing document was filed electronically in compliance with

Local Rule. As such, the foregoing was served on all counsel of record who have consented to

electronic service. Pursuant to Fed. R. Civ. P. 5(d) and local rule, all others not deemed to have

consented to electronic service will be served with a true and correct copy of the foregoing via

email on this 4th day of June, 2020.

/s/ Papool S. Chaudhari

Papool S. Chaudhari